



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 15 2012

REPLY TO THE ATTENTION OF:

Andrew Hall
Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the Ohio Environmental Protection Agency's draft initial Title V Permit to Operate for Owens Corning, permit number P0108721, located in Mount Vernon, Knox County, Ohio. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments.

1. For units P001 and P015, and for the Ingredient Storage Bins Emissions Unit Group, the permit does not require any direct monitoring, recordkeeping, and reporting for the particulate emissions limits. If an applicable requirement contains no periodic monitoring, permitting authorities must add periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. In the Matter of: Williams Four Corners, LLC Sims Mesa CDP Compressor Station at 14-15, July 29, 2011. If the weekly checks for visible emissions from the stack serve as adequate monitoring for the particulate emissions limits, the Statement of Basis must demonstrate this as required under 40 C.F.R. §70.7(a)(5).
2. For units P004, P006, P030, P031, P032, P033, P037, P038, P039, continuous baghouse pressure drop monitoring is being used as the method of compliance for particulate and opacity limits (and for other emission limits in the case of units P037 and P039). However, the permit does not require the use of a bag leak detection system. Bag leaks can cause significant emission increases without a detectable change in pressure drop. We recommend that the permit require bag leak detection in combination with pressure drop monitoring.

We appreciate the opportunity to provide comments on this draft permit. Please feel free to contact me or Kaushal Gupta, of my staff, at (312) 886-6803 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in black ink and is positioned above the typed name.

Genevieve Damico

Chief

Air Permits Section